

MARK W. HARDEE
ATTORNEY AT LAW
1426 RICHLAND STREET
COLUMBIA, SOUTH CAROLINA 29201
(803) 799-0905
FAX: (803) 799-0470
E-MAIL: MWHARDEE@BELLSOUTH.NET

181522
INTERVENOR
#2 10/31/06 2:30pm

August 24, 2006

RECEIVED
AUG 25 2006
PSC SC
MAIL / DMS

Public Service Commission of South Carolina
Attention: Docketing Department
Post Office Drawer 11649
Columbia, SC 29211

Office of Regulatory Staff
Nanette S. Edwards, Esquire
Post Office Box 11263
Columbia, SC 29211

Doug Turner
d/b/a Onward Moving Service
1462 Hwy 185 S
Hodges, SC 29653

RE: Docket No: 2006-190-T – Application for Class E (Household Goods) Certificate
of Public Convenience and Necessity

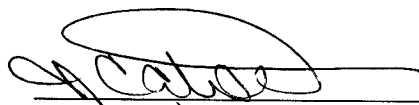
Dear Sir or Madam:

Please find enclosed the original and one copy of the Objection and Petition to Intervene
in the Notice of Filing Doug Turner d/b/a Onward Moving Service for filing in the above
referenced matter.

If you have any questions, please do not hesitate to contact our office.

Sincerely,

MARK W. HARDEE, ATTORNEY AT LAW


Angie Catoe
Paralegal to Mark W. Hardee

/acc
Enclosure

RETURN DATE: OK D. Duke
SERVICE: OK D. Duke

OBJECTION AND PETITION TO INTERVENE
IN THE NOTICE OF FILING
DOUG TURNER D/B/A ONWARD MOVING SERVICE

DOCKET NO. 2006-190-T

Dickert's Moving and Storage, Inc., (Dickert's) objects to the above referenced application and moves to intervene for the following reasons:

1. Dickert's is a moving company located in Greenwood County and operates in Greenwood, Greenville, Newberry, Saluda and Abbeville counties. Dickert's is, therefore, an interested party to this Application. The granting of this application will severely harm Dickert's economic interests and be detrimental to the citizens of Greenwood, Greenville, Newberry, Saluda, and Abbeville Counties.

2. Based on information and belief, Doug Turner d/b/a Onward Moving Service, is not financially able to furnish services as specified in the application, nor has he provided information to the commission from which the Commission could make an informed determination as to his financial viability.

3. Based on information and belief, Doug Turner d/b/a Onward Moving Service does not have the adequate experience to perform these services properly.

4. Based on information and belief, Dough Turner d/b/a Onward Moving Service has operated as a moving service while unlicensed, contrary to the Rules of the Public Service Commission.

5. There is not a need for additional carrier in the areas of Greenwood, Greenville, Newberry, Saluda and Abbeville Counties. Not only are there adequate carriers in these counties, but the cities of Greenville and Columbia have multiple moving contractors, which compete with Dickert's in these areas. There is no need for additional service in these counties.

6. Dickert's is affiliated with Allied Van Lines, a national moving and storage company, and has expended large sums in building an infrastructure of both, moving equipment and storage facilities to service the residents and the business community of Greenwood, Greenville, Newberry, Saluda and Abbeville counties, offering both moving services, as well as intrastate services for people moving into and out of the above listed counties. By allowing Dough Turner d/b/a Onward Moving Services under funded, under equipped venture to operate at cut rate prices, would endanger the viability of Dickert's, thus leaving the residents and business communities in Greenwood, Greenville, Newberry, Saluda, and Abbeville counties without a full service local moving company.

7. Upon information and belief, there is not a need within the counties of Greenwood, Greenville, Newberry, Saluda, and Abbeville counties for another moving service. These areas are not able to financially support an additional moving service.

WHEREFORE, Dickert's Moving and Storage, Inc., respectfully requests that this application and permission to do business in Abbeville, Greenwood, Anderson, McCormick and Greenville be denied. Dickert's request to appear at the hearing on this and that it be given thirty minutes for its presentation.

MARK W. HARDEE, ATTORNEY AT LAW



Mark W. Hardee
Attorney for Petitioner
1426 Richland Street
Columbia, South Carolina 29201
(803) 799-0905
(803) 799-0470 (fax)

Columbia, South Carolina
August 24, 2006

CERTIFICATE OF SERVICE

I, Angie Catoe, an employee with the law firm of Mark W. Hardee, Attorney at Law, do hereby certify that on the 14 day of August, 2006, I served a copy of the foregoing: ***Objection and Petition to Intervene in the Notice of Filing Doug Turner d/b/a Onward Moving Service,*** upon the following, by placing a copy of same in the United States Mail, postage prepaid and return address clearly indicated to the addressed to the following:

Public Service Commission of South Carolina
Attention: Docketing Department
Post Office Drawer 11649
Columbia, SC 29211

Office of Regulatory Staff
Nanette S. Edwards, Esquire
Post Office Box 11263
Columbia, SC 29211

Doug Turner
d/b/a Onward Moving Service
1462 Hwy 185 S
Hodges, SC 29653



Angie Catoe